

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA,)	
)	
v.)	
)	CRIMINAL CASE NO. 1:11-CR-161-1
JOHNNY REID EDWARDS.)	
)	
)	

JOHN EDWARDS' MOTION FOR A BILL OF PARTICULARS

Pursuant to Federal Rule of Criminal procedure 7(f), Mr. Edwards moves for the Court to grant him a bill of particulars and require the government to provide the following information concerning the Indictment:¹

1. In Count One, paragraph 14:
 - a. specify where, other than the Middle District of North Carolina, you allege the conspiracy to have occurred; and
 - b. identify the “others” who are “known” as the co-conspirators;
2. In Count One, paragraph 15, identify the “among others” manner and means alleged;
3. In Count One, paragraph 19:
 - a. identify the “others” who committed and caused the acts alleged;
 - b. specify the “among others” overt acts; and
 - c. specify the “elsewhere” in which the acts alleged occurred;

¹ By letter dated November 21, 2011, Mr. Edwards requested these particulars from the government, who denied the request by a telephone call on November 22, 2011.

4. In Count One, paragraph 20, identify the “individuals” who were discussed to provide money;
5. In Count One, paragraph 24, specify the "among other things" for which the funds alleged were spent;
6. In Count One, paragraph 29, specify the "among others" expenses alleged;
7. In Count Two, paragraph 35, specify where, other than the Middle District of North Carolina, you allege the acts to have occurred;
8. In Count Three, paragraph 37, specify where, other than the Middle District of North Carolina, you allege the acts to have occurred;
9. In Count Four, paragraph 39, specify where, other than the Middle District of North Carolina, you allege the acts to have occurred;
10. In Count Five, paragraph 41, specify where, other than the Middle District of North Carolina, you allege the acts to have occurred;
11. In Count Six, paragraph 43 specify:
 - a. where, other than the Middle District of North Carolina, you allege the acts to have occurred; and
 - b. how Mr. Edwards "caused" the John Edwards for President Committee to create and submit reports.

Dated: November 28, 2011

/s/ James P. Cooney III

James P. Cooney III, N.C. Bar No. 12140

jcooney@wcsr.com

WOMBLE CARLYLE SANDRIDGE & RICE, PLLC

One Wells Fargo Center

Suite 3500, 301 South College Street

Charlotte, NC 28202-6037

(704) 331-4980 (phone)

(704) 338-7838 (fax)

/s/ Abbe David Lowell

Abbe David Lowell, *pro hac vice*

ADLowell@Chadbourn.com

Christopher D. Man, *pro hac vice*

CMan@Chadbourn.com

CHADBOURNE & PARKE LLP

1200 New Hampshire Ave., NW

Washington, DC 20036

(202) 2974-5600 (phone)

(202) 974-5602 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2011, I electronically filed the foregoing **MOTION FOR A BILL OF PARTICULARS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Brian Scott Meyers
U.S. Attorney's Office – EDNC
Terry Sanford Federal Building
310 New Bern Avenue, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4530
Fax: (919) 856-4487
Email: brian.s.meyers@usdoj.gov

David V. Harbach
U.S. Department of Justice
Public Integrity Section
1400 New York Avenue, NW, Suite 1800
Washington, DC 20005
Telephone: (202) 262-7597
Fax: (202) 514-3003
Email: david.harbach@usdoj.gov

Jeffrey E. Tsai
U.S. Department of Justice
Public Integrity Section
1400 New York Avenue, N.W., Suite 1800
Washington, DC 20005
Telephone: (202) 307-0933
Fax: (202) 514-3003
Email: jeffrey.tsai@usdoj.gov

Robert J. Higdon
U.S. Attorney's Office – EDNC
Terry Sanford Federal Building
310 New Bern Avenue, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4530
Fax: (919) 856-4487
Email: bobby.higdon@usdoj.gov

/s/ James P. Cooney III

James P. Cooney III (NCSB # 12140)
Womble Carlyle Sandridge & Rice, PLLC
One Wells Fargo Center
Suite 3500, 301 South College Street
Charlotte, NC 28202
Telephone: (704) 331-4980
Email: jcooney@wcsr.com

Attorney for Defendant